

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CAROL M. MCDONOUGH, *et al.*,

Plaintiffs,

v.

TOYS “R” US, INC., d/b/a Babies “R” Us, *et al.*,

Defendants.

No. 2:06-cv-0242-AB

ARIEL ELLIOTT, *et al.*,

Plaintiffs,

v.

TOYS “R” US, INC., d/b/a Babies “R” Us, *et al.*,

Defendants.

No. 2:09-cv-06151-AB

PROPOSED ORDER

AND NOW, this ____ day of _____, 2011, upon consideration of Plaintiffs’ Motion for Award of Attorneys’ Fees, Expenses, and Incentive Awards for Named Plaintiffs, as well as all objections and other papers submitted in objection to or in support of Plaintiffs’ Motion, Plaintiffs’ Motion is GRANTED. The Court orders as follows: (1) Class Counsel shall be paid attorneys’ fees in the amount of 33-1/3% of the Settlement Amount (\$11,746,667.00), plus any interest accrued on that amount, from the Settlement Fund; (2) Class Counsel shall be paid for their litigation expenses in the amount of \$2,270,025.77 from the Settlement Fund; and (3) each Named Plaintiff shall be paid an Incentive Award in the amount of \$2,500.00 from the Settlement Fund.

SO ORDERED.

Judge Anita Brody